



**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION**  
**Baltimore District Office**

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November 18, 2005

**VIA FACSIMILE AND U.S. MAIL**

Aliza R. Karetnick, Esq.  
Wolf, Block, Schorr and Solis-Cohen, LLP  
1650 Arch St., 22<sup>nd</sup> Floor  
Philadelphia, PA 19103-2097

Re: EEOC and Kathy Koch v. LA Weight Loss, Case No. WDQ-02-CV-648

Dear Aliza:

The U.S. Equal Employment Opportunity Commission ("EEOC") has received your client's correspondence of October 13, 2005, regarding EEOC's answers to your client's Fifth Set of Interrogatories to Plaintiff and EEOC's responses to your client's Third Set of Requests for Production of Documents to Plaintiff. EEOC finds your client's arguments to be legally and factually flawed and entirely unpersuasive. In this regard, EEOC draws your client's attention to the substantial body of authority applying the attorney-client privilege to preliminary consultations and denying discovery of questionnaires and other written statements based upon privilege and the attorney work product doctrine. Notwithstanding EEOC's objections to the discovery at issue, in the very near future EEOC will provide a list of the names, last known addresses, and last known telephone numbers of the individuals who returned questionnaires to EEOC and who have not previously been identified at any time as claimants regarding whom EEOC sought or presently seeks relief in this action. With only a few exceptions, all persons previously identified as EEOC claimants have completed questionnaires. Your client is already aware of their identities. In all other respects, EEOC will not provide the discovery at issue for all of the reasons previously stated in its objections.

Sincerely,

  
Ronald L. Phillips  
Trial Attorney

cc: Pamela J. White, Esq.